

Supporting Statement for Pre-Discharge Compensation Claim
VA Form 21-526c
2900-0743

A. Justification

1. The Department of Veterans Affairs (VA), through its Veterans Benefits Administration (VBA), administers an integrated program of benefits and services established by law for veterans, service personnel, and their dependents and/or beneficiaries. Title 38 U.S.C. 5101(a) provides that a specific claim in the form provided by the Secretary must be filed in order for benefits to be paid to any individual under the laws administered by the Secretary. This form will be used in a joint effort between VA and the Department of Defense (DoD) to expedite the process to determine VA disability compensation.
2. The Pre-Discharge Compensation Claim is to be used by service members to file claims under the Benefits Delivery at Discharge or Quick Start programs under Title 38 U.S.C. 5101(a). This will be a permanent form available for public use.
3. VA Form 21-526c which will become available on the One-VA web site in a fillable electronic format and VBA's Virtual VA application. VBA maintains a secure server for forms of this type, but does not currently have the technology in place to allow for the complete submission of the form. Validation edits are performed to assure data integrity. Efforts within VA are underway to provide a mechanism to allow the information to be submitted electronically with a recognized signature technology. There currently is no utility process in place that will allow the data submitted on the form to be incorporated with an existing centralized legacy database.
4. Program reviews were conducted to identify potential areas of duplication; however, none were found to exist. There is no known Department or Agency which maintains the necessary information, nor is it available from other sources within our department.
5. The collection of information does not involve small businesses or entities.
6. The VA compensation and pension programs require that statements submitted by or on behalf of a claimant contain certification by the respondent that the information provided is true and correct. This form is designed to facilitate claims processing by providing a uniform format for the certification statement.
7. There is no special circumstance requiring collection in a manner inconsistent with 5 CFR 1320.6 guidelines.
8. The Department notice was published in the Federal Register on October 1, 2012, page 60028. VA received one comment from Renee Demchak regarding potential increased respondents and feasibility of making the information collection available for electronic submission.

VA responded: We appreciate and have considered your comments on the Pre-Discharge Compensation Claim form.

As you note in your comment, the number of people affected by the pre-discharge compensation will increase as the number of units getting deployed increases. We agree that number of respondents may increase over time; however, we estimate our respondents based on current available information. We will continue to monitor the number of respondents and, if necessary, adjust our estimates based on our review of the number of units getting deployed. We also agree that incorporation of this form into eBenefits and the Stakeholder Enterprise Portal is desirable. We will explore the feasibility of that suggestion as well. Thank you again for your insightful comments.

9. No payments or gifts to respondents have been made under this collection of information.

10. The records are maintained in the appropriate Privacy Act System of Records identified as 58VA21/22/28, ‘‘Compensation, Pension, Education, and Rehabilitation Records—VA’’ as set forth in Privacy Act Issuances, 1993 compilation found in 74 Fed. Reg. 117 (June 19, 2009).

11. There are no questions of a sensitive nature.

12. Estimate of Information Collection Burden.

a. Number of Respondents is estimated at 161,000 per year.

b. Frequency of Response is one occasion for most beneficiaries.

c. Annual burden is 40,250 hours.

d. The estimated completion time of 15 minutes is based on review by staff personnel and uses of a similar form.

e. The total estimated cost to respondents is \$603,750 (40,250 hours x \$15 per hour).

13. This submission does not involve any recordkeeping costs.

a. Processing/Analyzing costs \$1,482,118

(GS-12/5 @ \$40.66 x 40,250 x 15/60 minutes = \$ 411,885)

(GS-9/5 @ \$28.04 x 40,250 x 47/60 minutes = \$884,077)

(GS-5/5 @ \$18.50 x 40,250 x 15/60 minutes = \$ 186,156)

b. Printing and production cost \$22,560

c. Total cost to government \$1,504,678

15. This is no change in burden.

16. The information collection is not for publication or tabulation use.

17. The collection instrument, VA Form 21-526c may be reproduced and/or stocked by the respondents and veterans service organizations. This VA form does not display an expiration date, and if required to do so would result in unnecessary waste of existing stocks of this form. This form is submitted to OMB every 3 years. As such, this date requirement would also result in an unnecessary burden on the respondents and would delay Department action on the benefit being sought. VA also seeks to minimize its cost to itself of collecting, processing and using the information by not displaying the expiration date. For the reasons stated, VA continues to seek an exemption that waives the displaying of the expiration date on VA Form 21-526c.

18. This submission does not contain any exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods

The data collection does not employ statistical methods.